

**Settlement Services, Inc.**  
**Newsome v. Up-To-Date-Laundry Settlement Administrator**

**P.O. Box 11190**  
**Tallahassee, FL 32302-3190**

November 1, 2004

Douglas Huron  
Heller, Huron, Chertkof, Lerner,  
Simone & Salzman, P.L.L.C.  
1730 "M" St., NW, Suite 412  
Washington, DC 20036

Dear Doug:

This letter is to summarize the duties undertaken and results of the claims process, to date.

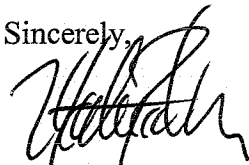
In June 2004, we received from Philip Simon data files showing the names and addresses of Class Members from 1998, 1999, 2002, 2003, and 2004. In addition, we received yearly Employee Earnings Records for the years 1998 through 2003 and for the first quarter of 2004. Using this information, we created a master class member database of 1,483 individuals.

Notice and Claim Form packets were mailed to 1,483 Class Members on July 28, 2004. Of these, 644 have been returned as undeliverable by the U. S. Postal Service. We conducted a trace of those whose notices were returned as undeliverable, and remailed notice packets to the addresses obtained via the trace. Of the notices sent to trace addresses, 314 have been returned undeliverable.

We staff a toll-free phone line to which Class Members have been directed to call with questions. To date, we have received approximately 101 phone calls.

We received 332 Timely Claim Forms and 13 Untimely Claim Forms. We received four timely opt-outs (two of which were from individuals who turned out to be ineligible to be in the class). We received two untimely opt-outs, one of which was subsequently withdrawn, and we received an additional 12 opt-outs that were also later withdrawn.

Sincerely,



Mark Patton  
Projects Coordinator  
Settlement Services, Inc.